

March 19, 2001

Attn: PL 106-107 Comments
Department of Health and Human Services
200, Independence Avenue SW
Room 517 D
Washington D.C. 20201

Dear Colleagues:

These comments are provided by the sponsored projects administration and accounting offices at the University of Kentucky. Most are general in nature; several specific comments have been sent directly to agency contacts.

We strongly support the PL 106-107 requirements to develop and implement plans to streamline and simplify procedures related to Federal financial assistance. Your success in fulfilling these requirements will directly effect the efficiency and effectiveness of the grantee community.

The one overriding concept in all of our feedback is this: continue to work toward government wide consistency, uniformity and standardization. The interagency approach is essential to the goals of streamlining and simplifying. If each agency "simplifies" in a different way, it will not result in streamlining for the recipient.

Application and Reporting Forms

Agencies are commended for using the Internet to enhance the availability of program information and application forms. The working group might consider the feasibility of a single website with links to all agency proposal and reporting forms.

A wide variety of forms are required by different federal agencies. While a common set of data may eventually be transmitted electronically to all agencies, in the interim, we recommend working toward standardization of existing forms.

While most agencies have incorporated all institutional certifications into one signature line, some still require multiple signed forms with a single proposal. We recommend that all agencies rely on one institutional signature per proposal.

Terms and Conditions

The following issue may be considered as a condition of award but actually begins during proposal preparation. Some agencies continue to encourage cost sharing when it is not required by the program. Although the issue of institutional cost sharing has been studied and the detrimental effects on universities well-documented, inconsistencies still exist. Cost sharing significantly impacts the proposal and award administration procedures of the grantee institution. Programs with ambiguous requirements are particularly troublesome. We recommend that all agencies be encouraged to adopt policies consistent with the one issued by NSF in Important Notice No. 124.

One way agencies can create more uniformity is to implement A-21 and A-110 with few or no exceptions and include a delegation of authority to grantees wherever allowed by those regulations.

Payment Systems

The federal payment systems currently in use at the University of Kentucky are GAPS, ASAP, Smartlink, Fastlane, PAPRS. Comments concerning a specific system will be forwarded to the agency contact. There is wide variation in the ease of use of these systems as well as the level of assistance provided. In general, systems which allow pooled drawdowns are significantly less time-consuming and more efficient for the grantee than those that require individual document identification.

The use of multiple payment systems does cause a burden due to the human resources required to administer a variety of disparate systems. It would be helpful to have more consistency among payment systems as well as a single gateway (e.g. Smartlink) when requesting funds.

Audit Issues

No comment.

Electronic Processing

The University of Kentucky uses Fastlane extensively as well as a number of electronic payment systems. Many federal agencies are sending notices and awards via e-mail and the Internet. This is a tremendous improvement over paper distribution and we encourage further use of this method of notification.

There are several ways agencies can prepare organizations for future electronic options. The primary recommendation is, again, consistency among agencies. It is extremely expensive and time-consuming to implement institutional electronic systems and to educate users about agency systems. With the exception of the National Science Foundation, there is no clear indication of the direction to be taken by federal agencies in developing electronic systems. Institutions cannot change direction quickly after significant investments have been made. We strongly support the Federal Commons

approach to coordination and consistency among the agencies in the development of future systems.

We also recommend piloting electronic approaches by applying them to a few programs initially. Be sure the system has adequate support at the agency with “help” resources for agency and university staff. Also, it is imperative that institutional approval be integral to any system.

Thank you for the opportunity to comment.

Sincerely,

Director
Office of Sponsored Projects Administration